600 Old Country Road, Suite 230, Garden City, NY 11530 Tel: 516-357-0056 Fax: 516-357-0069 www.llalawfirm.com

Steven M. Lester Robert J. La Reddola *

ril@llalawfirm.com NYC Office (by appointment only): 46 Trinity Place, #1, New York, New York 10006 (646) 415-8171

October 26, 2018

Hon. Sandra J. Feuerstein, U.S.D.J. United States District Court Eastern District of New York 100 Federal Plaza Central Islip, New York 11722

> Schojan v. County of Nassau, et al., Re:

> > Case No.: 16-CV-04790

Update and Notice to Produce County Witness

Dear Judge Feuerstein:

We write to report that the settlement funds in this matter have cleared our attorney escrow account. As mentioned in our October 26, 2018 status letter we will be holding these funds in escrow as we have a Show Cause hearing in this matter scheduled for November 1, 2018.

In regard to this Court's November 1, 2018 Show Cause hearing for contempt, we are serving a Notice to Produce (see attached) upon Deputy Sheriff Robert Mastropieri, the head of the Property Division at the Nassau County Sheriff's Office, who may have relevant information related to the present policy for the return of firearms, which may be of use to Your Honor.

RJL:jv

Enclosure

Cc: Ralph Reissman, Esq. (w/encl.)

UNITED STATES DISTRICT COURT	
EASTERN DISTRICT OF NEW YORK	
	X
PETER SCHOJAN,	

16-CV-4790

Plaintiff,

NOTICE TO PRODUCE

-against-

NASSAU COUNTY SHERIFF'S DEPARTMENT, MICHAEL J. SPOSATO, ROBERT MASTROPIERI and NASSAU COUNTY,

Defendants.

-----X

THE PEOPLE OF THE STATE OF NEW YORK

To: Robert Mastropieri
Nassau County Sheriff's Department
Property Division
240 Old Country Rd.
Mineola, New York 11501

PLEASE TAKE NOTICE that you are hereby required to produce on the Show Cause hearing of this matter on November 1, 2018 at 11:15 a.m. at the United States District Court, Eastern District of New York, 100 Federal Plaza, Courtroom 1010, Central Islip, New York, the original of the following documents, to wit:

Identify, and produce at trial, person with knowledge and information regarding
the policies and procedures of the Nassau County Sheriff related to return, storage
and destruction of all longarms currently in effect and all documents related
thereto.

Dated: Garden City, New York October 26, 2018

La Reddola, Lester & Associates, LLP

By: Robert J. La Reddola, Esq.

Attorneys for Plaintiff

600 Old Country Road - Suite 230 Garden City, New York 11530

(516) 745-1951